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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

RUSSELL PITKIN and MARY PITKIN,
Co- Personal Representatives of the Estate of
MADALINE PITKIN, Deceased,

Plaintiffs,

v.

CORIZON HEALTH, INC., a
Delaware Corporation; **CORIZON**
HEALTH, INC., a Tennessee Corporation;
WASHINGTON COUNTY, a government
body in the State of Oregon; **JOSEPH**
MCCARTHY, MD, an individual; **COLIN**
STORZ, an individual; **LESLIE ONEIL,** an
individual; **CJ BUCHANAN,** an individual;

Case No.: 3:16-cv-02235-AA

**DECLARATION OF TIMOTHY J. JONES
IN SUPPORT OF PLAINTIFFS' MOTION
TO COMPEL**

Page 1 – DECLARATION OF TIMOTHY J.
JONES

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LOUISA DURU, an individual; **MOLLY JOHNSON**, an individual; **COURTNEY NYMAN**, an individual; **PAT GARRETT**, in his capacity as Sheriff for Washington County; **JOHN DOES 1-10**; and **JANE DOES 1-10**,

Defendants.

I, Timothy J. Jones, do declare and state as follows:

1. I am one of the attorneys representing plaintiffs in this matter. I make the below statements based on personal knowledge and am competent to testify to the same.

2. On February 13, 2017, I conferred with Corizon's counsel, Richard Hansen, regarding discovery related to the Sentinel Event investigation. Attached as Exhibit A is a letter I sent to Mr. Hansen regarding our conferral.

3. I conferred with Mr. Hansen several other times regarding discovery related to the Sentinel Event investigation conducted by Corizon and gave Corizon notice that plaintiffs would file a motion to compel regarding such discovery. Attached as Exhibit B is a letter to Ms. Hansen memorializing our conferral regarding such discovery.

4. Attached as Exhibit C is a true and correct copy of defendant Corizon's Policy and Procedure on the Sentinel Event Review Process: DOC Contracts, Effective 01/01/13, Bates Nos. CORIZON007175-79.

5. Plaintiffs have a substantial need for documents related to defendants' investigation conducted into Ms. Pitkin's death. Plaintiffs cannot obtain the facts resulting from the investigation – defendant's findings as to what happened related to Ms. Pitkin's, what policies and procedures caused the death and whether the death was preventable, from any other equivalent source.

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I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 20th day of October, 2017.

/s/ Timothy J. Jones

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